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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

In re

CASE NO.: 21-50915-SLJ

PIERCE CONTRACTORS, INC.

**EX-PARTE APPLICATION TO SET
PLAN REVIEW CONFERENCE**

Debtor

CHAPTER 11
(Subchapter V)

Date: None set
Time: None Set
Ctrm.: Telephonic or Video Only***

Comes now Debtor Pierce Contractors, Inc. and respectfully requests that a plan review conference be set in the herein case.

1. Debtor filed the herein case on July 9, 2021.
2. A foreclosure sale has been set for July 19, 2021. A motion to impose the stay is set for July 15, 2021.
3. In a prior case creditors were disenchanted that the case was not expeditiously prosecuted.

4. In the herein case, pleadings were expeditiously filed. Already filed are:

Application to Employ The Fuller Law Firm, P.C.

Motion to value to cram 1st trust deed

Motion to value to strip two junior deeds of trust

Motion to incur debt;

Motion to impose stay;

Subchapter V Plan;

5. If the plan is consensual, creditors will enjoy substantial payment within two months of the Effective Date.

6. The UST is already familiar with this case from a prior filing filed by Mlnarik Law Offices.

7. The undersigned has conferred with the Subchapter V trustee to brief her of Debtor's intentions.

7. Subchapter V cases are meant to be expeditiously prosecuted. The San Jose Division, however, mandates a plan review conference such that the plan cannot be set for hearing until the plan has been reviewed.

WHEREFORE Debtor respectfully requests that the Plan be set for a plan review conference at the earliest available, convenient date.

DATED: July 14, 2021

THE FULLER LAW FIRM, PC

By: /s/ Lars T. Fuller
LARS T. FULLER
Attorney for Debtor